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CT Co

P.O. Box 6820, Traverse City, MI 49696
1755 Barlow Street, Traverse City, MI 49686
Phone (231) 933-4041
Fax (231) 933-4393

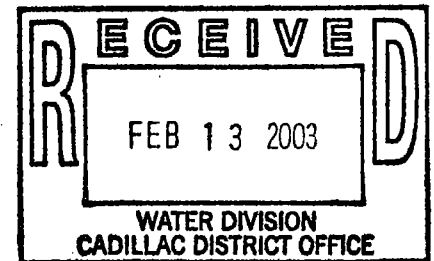
February 12, 2003

VIA Hand Delivery

Mr. Philip Roycraft
District Supervisor
MDEQ-WMD
Cadillac District Office
120 W. Chapin
Cadillac, Michigan 49601-2158

Mr. Michael Stiffler
District Supervisor
MDEQ-SWQD
Cadillac District Office
120 W. Chapin
Cadillac, Michigan 49601-2158

Re: Consent Order No. 31-07-02
Compliance Program Section IV(d.)(1.)
Secondary Containment Work Plan
Williamsburg Receiving & Storage
ISE Project # 02399084-01E



Gentlemen:

This communication is intended to provide Michigan Department of Environmental Quality (DEQ) staff the Work Plan required pursuant to the referenced Consent Order (CO) which became effective August 16, 2002.

Please find enclosed the following materials:

Stormwater Structural Control Improvements and Brine Mixing Area (Sheet 1 only)
Standard Operating Procedure for Brine Transfer
Brining Pit Stormwater Retention Areas
Process Wastewater Piping Diagram

WORK PLAN FOR COMPLIANCE WITH MAC R 324.2005

The following are requirements under the provisions of MAC R 324.2005 :

1. Provide secondary containment structures for outdoor storage areas used to store liquid polluting materials no later than August 31, 2003 unless alternate secondary containment is authorized by MDEQ pursuant to R 324.2005(5).
2. Construct secondary containment structures using impervious, compatible materials capable of containing liquid polluting materials so that spills or leaks may be recovered
3. Construct secondary containment structures so that polluting materials cannot escape to surface water or groundwater.

4. Construct secondary containment structures that provide a capacity not less than 10% of the total volume of all containers or 100% of the largest container, whichever greater
5. Construct secondary containment structures that allow surveillance of the containers and the timely detection of any leaks and recovery of spillage
6. Construct secondary containment structures that allow for the removal and proper disposal of any captured precipitation so that the minimum containment is maintained at all times
7. Design, construct, maintain and operate all use areas and indoor storage areas to prevent a release of polluting materials into public sewer systems, surface or groundwaters.
8. Polluting materials in solid form shall be protected to prevent run-off, seepage or leakage to public sewer systems, surface or groundwaters.

This Secondary Containment Work Plan (Work Plan) will address the work necessary to support compliance with MAC R 324.2005 for:

- Solid Cherry Brine Make-up Chemicals
- Liquid Cherry Brine Mixing and Transfer Areas
- Cherry Brining Process Vessels

Cherry brine make-up was not required in 2002, as cherries were not received for the brining process due to poor harvest throughout Michigan. All cherry brine make-up chemicals were removed from the site on or about September 1, 2002. Similarly, brine mixing equipment and tanks formerly located east of the maintenance building have been removed. Future acquisition of chemicals for make-up cherry brine will be procured using Just-in-Time inventory management to reduce the quantity of solid polluting materials stored at the site. Storage of solid polluting materials will be within the main plant building, protected from run-on, run-off and seepage.

Future brine mixing operations will be conducted within the plant building. Examination of the enclosed Process Wastewater Piping Schematic demonstrates that any release of polluting materials within the plant building will be conducted to the wastewater tank battery which is located within the maintenance and storage building north of the main plant building. The secondary containment work plan for brine mixing and transfer operations will address construction of secondary containment for the brine mixing vessel and will include the use of WRS's existing Standard Operating Procedure for Brine Transfer (enclosed) for transfer of brine to cherry brining process vessels.

WRS's cherry brining process is currently conducted within double-lined earthen pits. The recently submitted Storm Water Pollution Prevention Plan (SWP3) describes procedure for operation of these brining pits in a manner that prevents discharges of polluting materials to stormwater. As there are no public sewer systems in the vicinity of the WRS plant, the Work Plan will for construction of secondary containment will focus upon prevention of discharges in accordance with provision 3., above and meets the requirements of other provisions as applicable.

Design and construction options to evaluate include:

1. Earthen pits
2. Fiberglass tanks with indoor storage

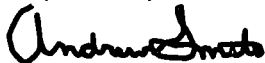
In addition, MAC R 324.2005(5) provides WRS the option of proposing alternate secondary containment measures.

This Work Plan includes a schedule for evaluating these options, selection and installation of the preferred secondary containment method for the make-up cherry brine mixing process and the cherry brining process.

Please contact me if you have any questions regarding this attached.

Sincerely,

INLAND SEAS ENGINEERING, INC.



Andrew Smits, P.E.
Environmental Engineering
Department Manager

enc.

cc: Mr. Christopher Hubbell- WRS
Joseph E. Quandt, Esq.- ZKDBT&Q
Edgar Roy, III Esq.- BFA&R
Mr. Richard D. Rusz- MDEQ/WD- Lansing
Mr. Frank Ruswick- MDEQ/WD- Lansing

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SCHEDULE FOR IMPLEMENTATION SECONDARY CONTAINMENT WORK PLAN

Brine Mixing Process Vessel

Preliminary Design	May 1, 2003
Final Design	June 1, 2003
Construction	August 31, 2003

Cherry Brining Process Vessels

Option #1-Earthen Pits	
Preliminary Design	April 1, 2003
Final Design	May 1, 2003
Construction	August 31, 2003

Option #2- Indoor Storage	
Preliminary Design	April 1, 2003
Final Design	May 1, 2003
Construction	August 31, 2003

Alternative Secondary Containment

Design Alternative and Monitoring Plan	April 1, 2003
Propose Alternative	May 1, 2003
MDEQ Approval	July 1, 2003?
Install/Operate	August 31, 2003

Notes: Dates provided are completion dates.
Only one option is planned for Cherry Brining Process Vessels, Final design and construction will only be completed for the selected option.

Standard Operating Procedure No. 2

Standard Operating Procedure for Brine Transfer

Williamsburg Recieving and Storage
10190 Munro Road
Williamsburg, Michigan

1.0 Introduction

The purpose of this Standard Operating Procedure (SOP) is to provide the minimum acceptable protocols for brine transfer. The intent of this SOP is to provide safe handling practices for workers at Williamsburg Receiving and Storage and to prevent a spill or leaks.

2.0 Referenced Documents

2.1 Storm Water Pollution Prevention Plan, Williamsburg Receiving and Storage.

3.0 Definitions

- 3.1 Brine Transfer- The movement of brine solution at the site. This includes but is not limited to: Initial Brine transfer from the plant to the pits, movement of the brine within the pits, transfer of brine and cherries mixture to the plant for processing.
- 3.2 Pits- The intermediate processing location where fresh cherries are introduced to "brine". This may include lined depressions in the earth or tanks within a building.

3.0 Equipment Requirements:

Industrial Grade Flexible Hose (s)
Drip Pans
Pump
Pump Containment Structure
Liner(s), as necessary

4.0 Procedures:

Prior to any movement of brine it is the responsibility of the crew to ensure that:

- Precipitation events are not probable during the time required to conduct the transfer.
- There are no visible signs of degraded, cracked or otherwise compromised piping
- All valves at the header system are turned off prior to initiation of pumping
- All secondary containment structures (drip pans) are in good shape suitable for the proposed use.
- All staff are trained to the appropriate immediate response procedure associated with the loss of brine material.

4.1 Initial transfer of brine into tanks/pits

WRS utilizes an industrial grade flexible hose from the brine point of origin to the brine pit header location, however, when the flexible hose crosses the road it is contained within a additional distribution pipe. Brine should be pumped from the brine mixing tanks with the following steps adhered to:

1. Initial start-up of the brine shall be a $\frac{1}{4}$ of the normal flow rate.
2. Visual inspection of all lines and connections to be made to ensure the no losses are present
3. After sufficient time has elapsed to ensure that no losses are present, slowly increase flow to normal operation pressure.
4. At all times the line and connections should be monitored for losses.
5. Connections to the header system will be made in a manner that does not allow for any losses.

4.2 Freshing up the Pits:

It is necessary to freshen up the sulfate levels in the pits at interval deemed appropriate by management. The operation is to be facilitated in similar fashion as Initial transfer of brine into the tanks/pits.

4.3 Transferring of Cherries and Brine

Transferring of a Cherry and Brine mixture to the plant from the Pits is similar operations as the transferring of brine to the pits originally.

5.0 Documentation

It is necessary to keep an adequate record of the location of hazardous substances at the site at all times, therefore it is necessary to document the transfer of all materials and the approximate quantity transferred. This will also allow for a double check on the potential for losses during the transfer.

All documentation of line transfers should be maintained in the brine transfer log, Attached Form.